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Superior Court of California
County of Los Angeles

JUN 10 2015

Sherri R. Carter, Executive Officer/Clerk
By Shaunya Bolden, Deputy

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 COUNTY OF LOS ANGELES, CENTRAL DISTRICT

BC 5 8 4 6 3 0

11 THE PEOPLE OF THE STATE OF CALIFORNIA,

12 Plaintiff,

13 vs.

14 WILLIE MAE HAWTHORNE, an individual;
15 TRACEY HOFF, an individual; RONA WADE, an
16 individual; LATONYA JACKSON, an individual; and
17 DOES 1 through 50, inclusive,

18 Defendants.

Case No.:

COMPLAINT FOR ABATEMENT
AND INJUNCTION

[CIVIL CODE § 3479, ET SEQ.]

(Unlimited Action)

19 PLAINTIFF, THE PEOPLE OF THE STATE OF CALIFORNIA, alleges as follows:

20 I. INTRODUCTION

21 1. This action ("Action") is prosecuted by Plaintiff, the People of the State of
22 California, for the purpose of eliminating a dangerous and volatile gang-related public nuisance
23 which exists at a single-family dwelling located at 2127 East 110th Street ("Property") in the
24 Watts neighborhood of the City of Los Angeles.

25 2. The Property is a longtime stronghold for members and associates of the Ten
26 Line Gangster Crips ("TLGC"), a notorious criminal street gang. In a string of incidents going
27 back more than fourteen years, Los Angeles Police Department ("LAPD") officers have
28 arrested TLGC gang members at the Property on multiple occasions in possession of guns

1 and illegal drugs. The Property has an entrenched reputation amongst LAPD officers and law-
2 abiding community members as a major hub of TLGC gang activity where gang-related
3 shootings frequently occur.

4 3. TLGC was established in the 1970's by the Boyd and Jackson Families. The
5 membership of TLGC is mostly comprised of African American gang members but Hispanic
6 gang members have been allowed into the gang to strengthen its numbers. Currently, there
7 are approximately 90 documented members of TLGC. The African American members
8 are referred to as the Dead End Watts Crips (DEWC) or the Dead End Rida Family (DERF),
9 referring to the dead end of 110th Street, where the Property at issue is located and where
10 TLGC claim as their turf. This dead end cul-de-sac of 110th Street is near the intersection of
11 Lou Dillon Avenue. The Hispanic members refer to themselves as Diez Lineas which
12 translates to "Ten Line." TLGC show no allegiance to any gang other than the Diez Lineas
13 and commonly feud with other gangs in the areas such as the Project Crips, the Grape Street
14 Crips, Bad Ass Gangsters, Florencia 13, and Suicidals. TLGC claims as its "turf" the area of
15 Santa Ana Boulevard to the North, 111th Street to the South, Willowbrook Avenue to the West,
16 and the dead end of 110th Street East near Lou Dillon Avenue. Due to the layout of the
17 streets and neighborhood, the dead end of 110th Street provides TLGC an advantage because
18 it cannot be easily monitored by police, creating a perfect setting for criminal activity. TLGC
19 have engaged in a pattern of criminal activity ranging from vandalism, assaults with deadly
20 weapons, shootings, attempt murders, murders, narcotic sales, robberies, and burglaries.
21 They identify themselves with the major league baseball team Texas Rangers "T", the 110
22 Freeway street sign, and a hand sign. Most of the members of TLGC are blood relatives and
23 when questioned will commonly give the address of the Property because they identify the
24 Property as their home base.

25 4. The presence of gang members at the Property is tied to, among other things,
26 the fact that the primary property owner, Defendant Willie Mae Hawthorne ("Hawthorne") (Date
27 of Birth - December 20, 1932), has numerous children and grandchildren who are documented
28 TLGC gang members, who live at the Property either full or part time and "hang-out" at the

1 Property. These family members attract and invite other gang members to the Property.
2 Defendant Hawthorne's house is commonly referred to as "Grandma's House" by TLGC gang
3 members and Defendant Hawthorne has been unable or is unwilling to stop the Property from
4 being a gang stronghold.

5 5. The Property's association with TLGC has caused it to be the site of or directly
6 related to at least 12 shootings over the past 14 years, injuring or killing six people. Gang
7 shootings are typically underreported due to fear and intimidation of law abiding citizens by
8 gang members so in all likelihood the number of shootings is far higher. The last such
9 reported shooting incident occurred on November 11, 2014, in which a documented TLGC
10 gang member was shot while "hanging out" in front of the Property with a large group. The
11 Property has assumed a perilously symbolic role as a "bullet magnet", with residents in the
12 neighborhood fearful to have their children play outside. Prosecutors have filed this nuisance
13 abatement action in order to intervene in this lethal dynamic before another life is claimed by
14 this gang-related gunfire and other associated gang-violence.

15 II. THE PARTIES AND THE PROPERTY

16 A. Plaintiff

17 6. Plaintiff, the People of the State of California ("Plaintiff" or "People"), acting
18 through prosecutors in the Los Angeles City Attorney's Office, brings its sole cause of action
19 pursuant to its authority under Code of Civil Procedure section 731 to enforce Civil Code
20 section 3479 et seq. (the Public Nuisance Law).

21 B. The Defendants

22 7. Defendant Hawthorne is the primary owner of the Property and has owned the
23 Property, either solely or jointly, since approximately 1990. Defendant Tracey Hoff ("Hoff") has
24 an approximate one-eighth interest in the Property and acquired ownership interest in the
25 Property in May of 2007. Defendant Rona Wade ("Wade") also has an approximate one-
26 eighth interest in the Property and acquired ownership interest in the Property in May of 2007.
27 Defendant Latonya Jackson ("Jackson") has an approximate one-eighth interest in the
28 Property and acquired her ownership interest in August of 2008.

1 8. The true names and capacities of defendants sued herein as Does 1 through 50,
2 inclusive, are unknown to Plaintiff, who therefore sues said defendants by such fictitious
3 names. When the true names and capacities of said defendants have been ascertained,
4 Plaintiff will ask leave of the court to amend this complaint and to insert in lieu of such fictitious
5 names the true names and capacities of said fictitiously named defendants.

6 **C. The Property**

7 9. The Property is a single family dwelling with a back house (converted garage)
8 located to the rear of the Property.¹ (See Exhibit A.) The Property is located in a cul-de-sac
9 street containing single family homes, with the closest cross street being Lou Dillon Avenue.
10 (See Exhibit B.) A block wall in the cul-de-sac near the Property is constantly covered in
11 TLGC gang graffiti. (See Exhibits C & D.) Another block wall in front of the home directly to
12 the east of the Property is also covered in TLGC gang graffiti. (See Exhibit E.) The residents
13 that live in the neighborhood of the Property are well aware of the gang activity and shootings
14 occurring at the Property and are very fearful of the gang members and the nuisance activity.
15 These residents are scared to let their children play outside for fear of them being hit by a stray
16 bullet. Additionally, the gang members from the Property constantly block driveways in the
17 neighborhood and residents are fearful to say anything because they do not want to get into
18 confrontations with the aggressive gang members.

19 10. The Property is located approximately 100 feet from the Lighthouse Health Care
20 Center – a nursing and convalescent home. The Property is also located approximately 773
21 feet from Grape Street Elementary School and approximately 874 feet from San Miguel
22 Catholic School.

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28 ¹ The Property's legal description is: "The East Fifty Feet of Lot 64 of Walton Tract, in the City of Los Angeles, County of Los Angeles, State of California, As Per Map Recorded In Book 6 Page 194 of Maps, In The Office Of The County Recorder Of Said County," Assessor's Parcel Number 6067-009-056.

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11. On April 23, 2009, a Los Angeles Deputy City Attorney (different than the undersigned) and an LAPD Senior Lead Officer ("SLO") met with Defendant Willie Mae Hawthorne and her son Raymond Hawthorne. The prosecutor and SLO described to Defendant Hawthorne and her son the nuisance activity that was occurring at the Property, dating back to 2006. The prosecutor and SLO suggested a number of physical improvements that would make the Property more secure such as lighting, evictions, signing a LAPD trespass arrest authorization form, and posting signs. The prosecutor carefully explained to Defendant Hawthorne that she is responsible for the nuisance activity on her Property and the effect it has on the neighborhood and that a lawsuit could be filed against her if the activity does not stop. Defendant Hawthorne refused to sign the trespass arrest authorization form, post signs, or make any of the other suggested improvements. Defendant Hawthorne stated that she feels that she is doing a pretty good job of managing her Property.

IV. THE PUBLIC NUISANCE LAW

12. Civil Code section 3479 defines a public nuisance as “[a]nything which is injurious to health, including, but not limited to, the illegal sale of controlled substances, or is indecent or offensive to the senses, or an obstruction to the free use of property, so as to interfere with the comfortable enjoyment of life or property....” (See *City of Bakersfield v. Miller* (1966) 64 Cal.2d 93, 99 [“The Legislature has defined in general terms the word ‘nuisance’ in Civil Code section 3479. . . .”].)

13. Civil Code section 3480 defines a public nuisance as “one which affects at the same time an entire community or neighborhood, or any considerable number of persons, although the extent of the annoyance or damage inflicted upon individuals may be unequal.”

14. The case law is “replete with examples” of the “threat violent street gangs ... pose to the safety of peaceful Californians.” (*Castaneda v. Olsher* (2007) 41 Cal.4th 1205, 1216.) In a case involving gang-related gunfire similar to what is occurring at the Property here, the California Supreme Court explicitly recognized that “[s]treet gang activity can often subject” innocent bystanders “to unacceptable levels of risk.” (*Id.*) In *Medina v. Hillshore*

1 *Partners* (1995) 40 Cal.App.4th 477, 486, involving a wrongful death claim by the mother of a
2 young man shot by gang members, the Court said, "We agree that the congregation of gangs
3 poses a foreseeable risk of harm to the public." In particular, the whole spectrum of typical
4 street gang conduct, ranging from loitering, to public drinking and boisterousness, to drug
5 dealing, to gunfire, has been held to "easily meet the statutory standard" for a public nuisance
6 under Civil Code section 3479. (*People ex rel. Gallo v. Acuna* (1997) 14 Cal.4th 1090, 1120.)

7 15. Civil Code section 3491 provides for the methods by which public nuisances
8 such as those alleged herein may be abated. Civil Code section 3491 states that the
9 "remedies against a public nuisance are indictment or information, a civil action or abatement."
10 Abatement is "accomplished by a court of equity by means of an injunction proper and suitable
11 to the facts of each case." (*Sullivan v. Royer* (1887) 72 Cal. 248, 249.)

12 16. Code of Civil Procedure section 731 authorizes a city attorney to bring an action
13 to enjoin or abate a public nuisance. It provides in relevant part "[a] civil action may be brought
14 in the name of the people of the State of California to abate a public nuisance . . . by the city
15 attorney of any town or city in which such nuisance exists."

16 17. "[S]trict liability for nuisance historically attends the possession and control of
17 land." (*Leslie Salt Co. v. San Francisco Bay Conservation and Development Commission*
18 (1984) 153 Cal.App.3d 605, 618 n. 15 & 619). "It is immaterial whether the acts" of the
19 persons sought to be held liable for a nuisance "be considered willful or negligent; the essential
20 fact is that, whatever be the cause, the result is a nuisance." (*Snow v. Marian Realty*
21 *Company* (1931) 212 Cal. 622, 625-26; see also *Sturges v. Charles L. Harney, Inc.* (1958) 165
22 Cal.App.2d 306, 318 ["a nuisance and liability therefore may exist without negligence"]; *People*
23 *v. McCadden* (1920) 48 Cal.App. 790, 792 ["A judgment supported on findings that such
24 nuisance was conducted and maintained on the premises in question, regardless of the
25 knowledge of the owner thereof, is sufficient. Such knowledge on the part of the owner . . . is
26 unnecessary."].) This strict standard is because "the object of the act is not to punish; its
27 purpose is to effect a reformation of the property itself." (*People v. Bayside Land Co.* (1920)
28 48 Cal.App. 257, 261.)

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1 officers observed a group of male blacks standing in front of the Property. The officers
2 observed a male black wearing a gray sweatshirt and gray shorts (later identified as Drecore
3 Dodson ("Dodson")) standing with the group. As the officers approached the group, Dodson
4 began walking away and immediately grabbed onto his front waist band and appeared to
5 conceal a firearm or contraband. Dodson then ran toward a cinder block wall and jumped over
6 onto Santa Ana Boulevard South, while the other four male blacks standing with Dodson ran
7 inside the residence of the Property. Officers set up a perimeter and a K9 unit responded to
8 assist in the search of Dodson. The K9 unit located Dodson hiding inside a trash can at Santa
9 Ana Boulevard and Juniper Street. Dodson is currently on parole and a documented gang
10 member from Fudgetown Mafia Crips with the gang moniker of "BO." Dodson was arrested for
11 Penal Code section 3056 - Parole Violation, due to Dodson fleeing from the police. The
12 firearm was recovered the following day on June 6, 2014, from the yard of the residence
13 located one house east of the Property.

14 (b.) On **May 15, 2015**, LAPD Southeast Area Gang Enforcement Detail officers
15 conducted an investigative stop for a narcotics investigation at the Property, a property they
16 knew to be a gang and narcotics problem location. The officers observed Alvin Boyd and
17 Clevon Townsend, both TLGC gang members, sitting in a vehicle parked in front the Property,
18 smoking marijuana. Boyd and Townsend were questioned by the officers and then released.
19 Boyd is a grandson of Defendant Hawthorne who was shot in front of the Property in 2006 and
20 arrested twice at the Property.

21 (c.) On **May 6, 2015**, LAPD Officers assigned to Fugitives Division went to the
22 Property and arrested Spencer Williams, a TLGC gang member, for a felony warrant involving
23 a violation of Penal Code section 236 – False Imprisonment.

24 (d.) On **February 22, 2015**, LAPD Southeast area patrol officers received a radio call
25 of an ambulance battery at the Property. Upon their arrival at the Property, the officers met
26 with the victim. She stated that the suspect was her son Spencer Williams, a TLGC gang
27 member, and that they had been involved in a verbal altercation. The victim further stated that
28 she had been drinking in the back house of the Property, where she resides. The victim

1 observed that Williams had a gas can next to her front door. She took the can and threw it in
2 the trash. Williams came to retrieve the gas and was unable to find it. Williams, who appeared
3 to be in an altered state of mind due to possibly smoking rock cocaine, approached the victim
4 and discovered that the victim had thrown the gas can in the trash. Williams became
5 extremely angry and struck the victim with both hands striking her in the back of the head,
6 causing her to fall down. Once the victim was on the ground, Williams stated, "I'm going to
7 burn you, Bitch!" Williams then retrieved the gas can from the trash and began to douse the
8 victim with gasoline. While Williams was dousing the victim with the gasoline, he stated, "I
9 don't give a fuck, you can't fuck with me!" The victim told Williams that she was going to call
10 the police. Williams then fled the location.

11 (e.) On **November 11, 2014**, a shooting occurred at the Property. The victim of this
12 shooting was hit in the left buttocks. The victim stated that he had been visiting the Property
13 and described Defendant Hawthorne as being a grandmother figure to him. The victim stated
14 that there was a group of people at the Property that consisted of family and friends. Several
15 of the guests were standing outside in front of the Property and the victim had just walked out
16 of the house when he heard gunshots. The victim did not see where the shots were coming
17 from but turned to run and then is when he was shot in the buttocks. Witnesses to the
18 shooting stated that they saw a Honda with tinted windows turn into the driveway of the
19 Property and back out. Then unknown suspects fired 6 - 8 shots and fled westbound on 110th
20 Street. When officers asked the witnesses who did the shooting, one individual, who refused to
21 identify himself, stated "We know who did this! PJ (Watts Crips) did this shit!"

22 (f.) On **October 24, 2014**, LAPD Southeast Area officers responded to the Property
23 and arrested resident Lisa Hendley for robbery. The officers talked to the victim of the robbery
24 who stated that the victim was selling corn in the area of 110th Street east of Lou Dillon when
25 she was approached by Lisa Hendley and two other suspects. Hendley asked for corn with
26 extra cheese and then began punching the victim, knocking her to the ground. While the
27 victim was on the ground Hendley and two other suspects continued to hit the victim. Suspect
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1 #2 removed the victim's property and fled the scene. Hendley also fled the scene and was
2 seen entering the Property after the robbery.

3 (g.) On **April 22, 2014**, LAPD Southeast Area officers arrested Spencer Williams at
4 the Property on a felony warrant. He is a resident of the Property, Defendant Hawthorne's
5 grandson, and a member of TLGC.

6 (h.) On **October 20, 2013**, LAPD Southeast Area officers received a radio call
7 regarding an assault with a deadly weapon by suspect Tranekia Richardson. The comments of
8 the radio call further stated that Richardson is threatening an unknown person with a large
9 silver gun and was last seen entering the Property. Richardson is a resident of Property. The
10 officers responded to the Property and took Richardson into custody without incident. The
11 victim of the assault told the officers that Richardson and the victim's daughter were fighting on
12 the street in front of 2106 East 110th Street because Richardson was taking pictures of victim's
13 house. The fight was stopped and Richardson entered the rear yard of the Property and
14 returned armed with a "big silver gun that looked like a 9mm". Richardson began to walk
15 towards the victim and her daughter, but Richardson was stopped by the victim. Richardson
16 spat at the victim and then began pointing the gun in the direction of the victim and her
17 daughter. Richardson then stated, "I will pistol whip you and then I will pop you." Richardson
18 then placed the gun in her purse and walked away toward the Property. The victim felt
19 threatened and believed that Richardson was capable of carrying out her threat. Richardson
20 was arrested for Penal Code section 245 (a) (2) – Assault with a Deadly Weapon.

21 (i.) On **June 27, 2013**, LAPD Southeast Area officers received a radio call regarding
22 a shooting in progress. When they arrived at the scene of the shooting, the officers were told
23 by witnesses that the suspects ran to the house at the end of the street where they usually
24 hang out, indicating the Property. Officers obtained consent from Defendant Hawthorne to
25 search the Property. During the search of the Property, officers recovered a 12 gauge
26 Mossberg shotgun on the top portion of a chicken coop located in the back of the Property
27 behind the garage. The officers also recovered two different types of shotgun ammunition in
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boxes located on the bottom portion of the chicken coop. The officers also recovered two hollow point bullets for a .38 special from inside the residence.

(j.) On **November 8, 2012**, LAPD Southeast Area officers responded to a radio call of a "415 man with a knife" at the Property. Further comments to the radio call stated that the suspect is the younger brother of the victim who is armed with three knives, threatening to kill the victim and her child. The victim told the officers that the suspect had become angry with the victim and had grabbed three knives from the kitchen. The suspect then began swinging the knives toward the victim, attempting to cut her. The victim, in fear for her life, locked herself inside one of the bedrooms and called the police. The officers detained the juvenile suspect without incident and discovered that the juvenile suspect is on probation and a member of TLGC. Only one individual at the scene was willing to talk to the police regarding the incident. The juvenile suspect was arrested for Penal Code section 245 (a) (1) – Assault with a Deadly Weapon.

(k.) On **July 6, 2012**, LAPD Southeast Area officers received a radio call regarding a shooting at the Property. A witness to the shooting stated that he was at the Property visiting his aunt when he observed a gray Dodge Magnum driving up the street in his direction. The witness then noticed an arm come out of the front passenger window and a gun being pointed in his direction. The witness then heard the shooting and ran up the driveway to the house to get away from the gunfire. The witness heard approximately nine shots and saw the vehicle drive away. No one was injured from the shooting. The officers searched the area near the Property and found three casings from a .40 caliber gun on the street. Additionally, a vehicle parked in front of the Property had a bullet hole in its radiator.

(l.) On **June 30, 2012**, LAPD Southeast Area officers received a radio call of a family dispute at the Property involving a knife. When the officers arrived at the Property they observed that a fight had occurred between Tracie Philpot and her daughter ("victim"), both residents of the Property. The argument had started over the custody of victim's young child. Defendant Hawthorne witnessed the entire incident and attempted to break up the fight between her daughter and granddaughter but it continued to escalate. Philpot picked up a

1 knife and stabbed the victim, causing a six inch laceration on her forearm. Philpot was
2 arrested for Penal Code section 245 (A) (1) – Assault with a Deadly Weapon.

3 (m.) On **June 24, 2012**, LAPD Southeast Area officers received a radio call that an
4 assault with a deadly weapon shooting had just occurred at the Property. The officers
5 responded to the scene and observed a victim suffering from a gunshot wound to her upper
6 body. The victim, who is a resident of the Property, told the officers that at approximately 6:00
7 a.m. she had been walking down her driveway to get the newspaper when she observed a
8 white van on the street with a male Black sitting in the driver's seat. The victim picked up the
9 newspaper and turned around, heading back to her front door. When the victim opened the
10 front door she heard a loud noise and felt a sharp pain to her upper back area. One of the
11 bullets hit the victim in the back and exited through her chest.

12 (n.) On **April 18, 2012**, at approximately 11:00 p.m., a shooting occurred at the
13 Property. The following evening Defendant Hawthorne flagged down a patrol car and told the
14 police that someone shot through her window, striking the interior wall. Defendant Hawthorne
15 further stated that she saw a green car that drove down the street and turned around at the
16 dead end. She then heard the gunshot.

17 (o.) On **April 13, 2012**, LAPD Southeast Area patrol officers received a radio call of
18 an assault with deadly weapons involving firearms that had occurred at the Property. The
19 radio call further stated that the victim (a tow truck driver) was waiting at Santa Ana Boulevard
20 North and Hickory Street. The victim told that officers that he had been assigned to repossess
21 a black Toyota 4-Runner SUV at the Property. The victim went past the open gate to hook up
22 the SUV located in the driveway. The victim hooked up the SUV and then walked back to his
23 tow truck and sat in the driver's seat. The victim observed a Black male ("suspect #1") exit the
24 rear of the Property and run down the driveway towards the victim. Suspect #1 pulled open
25 the victim's driver's side door and held up his hands as if he was going to begin striking the
26 victim and said, "You crazy to come over here and think you gonna take our truck." The victim
27 attempted to pull his driver's side door closed to prevent suspect #1 from attacking him. At this
28 time the victim saw the passenger side door open and a second suspect (later identified as

1 Percy Hendley) standing there. Hendley was accompanied by two other male Blacks (later
2 identified as Jammar Philpot and Spencer Williams). Suspect #1 reached into the passenger
3 compartment and removed the victim's keys from the ignition. Suspect #1 then produced a
4 blue steel handgun and brandished it at the victim and told the victim, "Drop the car or I'll blast
5 you." The victim told suspect #1 that he could not drop the vehicle without it being turned on.
6 The victim asked for the key back so that he could drop the car. The victim also noticed that
7 one of the suspects had walked back to the entrance to the driveway and locked the driveway
8 gate, preventing the victim from leaving. The victim looked over at Hendley and noticed that
9 he had also produced a blue steel handgun with chrome edging and was holding it in victim's
10 direction. Hendley reached over with his free hand and began going through the victim's
11 pockets. Hendley also took the victim's cellphone from his pocket. According to the victim, all
12 the suspects were in possession of a firearm except for Williams. The victim further stated that
13 Hendley had been digging through his glove compartment and had removed a digital camera
14 during the search. Williams and Philpot also took turns going through the victim's clothing and
15 one of them removed the victim's wallet from his pocket. The victim told them that they could
16 take whatever they wanted and that he only wanted to leave. Suspect #1 finally gave the tow
17 truck keys back to the victim and the victim unhooked and dropped the SUV. The suspects
18 then let the victim back his truck out of the driveway and leave the location. The victim
19 checked his person and vehicle and noticed that his wallet had been left in the vehicle but his
20 camera was missing. Once the victim was some distance away from the Property he called
21 the police. After speaking to the victim the officers went to the Property and took Hendley,
22 Philpot, and Williams into custody, after being positively identified by the victim. The officers
23 also spoke with Defendant Hawthorne, who admitted that she had yelled at the victim from the
24 window. Defendant Hawthorne also stated that some of her grandchildren had gone outside
25 and were handling it. She had told them not to "handle it" but that they had done so anyway.
26 Defendant Hawthorne consented to a search of her Property and during the search officers
27 found a box of .40 caliber ammunition in the rear bedroom. The officers also recovered .88
28 gross grams of marijuana from Hendley's pocket. Philpot, Hendley, and Williams were

1 arrested for Penal Code section 211 – Robbery and additional filings were requested for false
2 imprisonment and a gang enhancement as they are all TLGC gang members. An additional
3 filing was requested for Hendley and Philpot for ADW with a firearm.

4 (p.) On **March 5, 2012**, LAPD Southeast Area patrol officers were conducting a
5 probation check at the Property on resident Rudy Hendley ("Hendley"). Hendley is a TLGC
6 with the gang moniker of "Rud Dog". Officers knocked on the door and a black female, who
7 identified herself as Hendley's aunt, said that he was not home. At the same time, two officers
8 who had been deployed to the back of the residence, observed a black male (later identified as
9 David Gurley ("Gurley")), holding what appeared to be a rifle in the garage of the Property.
10 The officers immediately ordered Gurley to drop the rifle and Gurley complied with the officers'
11 request. Gurley was standing next to four other male individuals. The officers detained Gurley
12 and the individuals and secured the weapon which turned out to be an airsoft rifle. The officers
13 conducted a search of the area and recovered a black plastic bag containing eleven .25 caliber
14 live rounds tucked between the cushion of a couch next to where Gurley had been standing.
15 The officers discovered that one of the four individuals standing next to Gurley was Hendley.
16 The officers conducted a probation search of Hendley's room and underneath his mattress the
17 officers recovered a .38 caliber steel revolver, along with six .38 caliber bullets. Hendley was
18 arrested for Penal Code section 29800 (a) (1) – Possession of a Concealed Weapon with a
19 Prior Conviction. Gurley was arrested for Penal Code section 30305 (a) (1) – Illegal
20 Possession of Ammunition. Two of the individuals located in the garage of the Property,
21 Esther Brown and Tyrell Singleton, were arrested on outstanding warrants. Singleton is a
22 resident of the Property and known member of TLGC with the gang moniker of "Lil Gutta".

23 (q.) On **February 22, 2011**, LAPD Southeast Area patrol officers responded to a
24 radio call, "ADW Shots Fired Just Occurred" at the Property. When the officers arrived at the
25 Property there were several individuals standing outside the residence. The officers
26 approached the individuals and attempted to speak with any possible victims or witnesses to
27 the shooting but all of the individuals refused to provide any information except that the
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1 shooting occurred in the alley. The officers recovered one .380 caliber casing from the alley
2 west of the Property.

3 (r.) On **February 21, 2011**, two female sisters were witnessing a fight at 110th Street
4 and Hickory Street, one and a half blocks from the Property, when a vehicle pulled up to their
5 location. One of the sisters (victim 1) observed Jammarr Philpot ("Philpot"), a documented
6 member of TLGC, exit the vehicle and begin punching the other sister (victim 2). Philpot then
7 produced an ice pick or screwdriver and stabbed victim 2 in the face. When the other sister
8 (victim 1) attempted to help victim 2, Philpot stated to victim 1, "I'll kill you." Philpot then
9 stabbed victim 1 in the chest, left forearm, and the back of her left shoulder. Victim 1 was able
10 to identify Philpot by name to the officers. Philpot had just recently been released from prison
11 for the murder of the brother of Victims 1 and 2. Two days after the stabbing, Philpot was
12 found on the sidewalk in front of the Property and arrested for Attempt Murder.

13 (s.) On **February 21, 2011**, shortly after the above incident, LAPD Southeast Area
14 officers received a help call for shots fired as well as a large uncooperative group at 110th
15 Street and Lou Dillon Avenue, located near the Property. When the officers arrived at the
16 scene they observed evidence of a shooting and received information by an unknown female
17 that the shooter was at the Property. The officers responded to the Property and made a
18 tactical plan to enter the residence to search for the shooter and any possible victims. As the
19 officers were clearing the residence, an individual (Rudy Hendley) attempted to flee the
20 residence but was detained by officers. Hendley, a known member of TLGC with the gang
21 moniker of "Rud Dog", notified the officers that he was on parole with search conditions and
22 lived at the Property. The officers conducted a parole search of the Property and recovered a
23 loaded firearm magazine from the top of the dresser located inside the northwest bedroom.
24 The rounds in the loaded magazine are the same caliber and had the same head stamp as the
25 rounds recovered from the scene of the shooting. The officers also recovered a box of 9mm
26 ammunition, concealed in a shoe box, inside the closet of this same bedroom. Since this is the
27 bedroom where officers believed Hendley slept, Hendley was arrested for Penal Code section
28 12316(B)(1) – Felon in Possession of Ammunition or Magazine. The shooting may have been

1 caused by tensions between the two factions within the TLGC. Earlier in the day, Jamar
2 Philpot had stabbed two sisters. After hearing about the stabbing, the boyfriend of the one of
3 the sisters, went to the Property to fight people associated with Philpot's faction of the TLGC,
4 including Rudy Hendley. The shooting occurred during or soon after the fight, and resulted in
5 people fleeing away from the Property. Officers searched the area of the shooting and found
6 casings which matched the type and brand of ammunition found inside the Property.

7 (t.) On **February 21, 2011**, Joseph Singleton, a resident of the Property, interfered
8 with police officers who had responded to the scene of the shooting. The officers were
9 assisting with crowd control and formulating a search plan in order to locate the shooting
10 suspects. As the officers were just about to walk toward two possible shooting suspects,
11 Singleton walked off the sidewalk and began advancing on one of the officers and stated,
12 "That's my son." Singleton appeared intoxicated and after an officer asked him to stay back,
13 he started yelling and assaulting the officer. Singleton was arrested for Penal Code section
14 148 (A) (1) – Interfering with a Police Officer.

15 (u.) On **September 3, 2010**, LAPD Southeast Area officers were in the area of 110th
16 Street and Hickory when they observed a male juvenile standing on the south curb of 110th
17 Street approximately 100 feet in front of the officers. The juvenile turned, looked directly at the
18 officers and immediately grabbed his front waistband with his right hand and began running
19 away from the officers. As the juvenile was running he pulled a black object from his front
20 waistband and ran northbound across 110th Street towards the Property. The officers
21 observed the juvenile jump headfirst into an open window on the Property. The officers looked
22 inside the window and observed the juvenile standing in front of a dresser. The juvenile was
23 ordered out of the Property. The juvenile, who is on probation, is a resident of the Property
24 and a member of TLGC. Defendant Hawthorne consented to a search of the Property. During
25 the search the officers recovered a loaded .22 caliber handgun, also known as a "Mini-
26 Revolver", inside a glasses case in a dresser located in the bedroom in which the juvenile was
27 found. The juvenile was arrested for Penal Code section 12025 (B) (5) – Possession of a
28 Concealed Firearm by an Ex-Con.

1 (v.) On **July 16, 2010**, an individual responded to LAPD Southeast Area to report
2 that she had been a victim of a battery earlier that day. The victim stated that she was at the
3 Property visiting her nieces when Michael Philpot (victim's nephew) came over to the
4 residence. Philpot joined in the victim's conversation then became angry for no apparent
5 reason. Philpot threw his soda on the victim and began punching her in the head. Philpot then
6 grabbed the victim by her hair and began dragging the victim on the ground and kicking her
7 numerous times. Family members pulled Philpot off of the victim and Philpot fled the location.
8 The victim had a circular (baseball) size lump on her right forehead area and a slightly smaller
9 lump on her right hairline. Victim also had a small abrasion to her right knee and held a
10 handful of hair that Philpot had pulled out of her scalp. As Philpot was leaving the location
11 numerous witnesses observed him scratching and kicking victim's vehicle, leaving numerous
12 dents.

13 (w.) On **April 21, 2008**, a drive-by shooting occurred at the Property, resulting in one
14 victim, a female juvenile, being shot. The shooting victim received a gunshot wound to her left
15 breast and was in stable condition. A witness to the shooting stated that a group of family and
16 friends were standing in the front yard of the Property when a dark blue or black Jeep
17 Cherokee drove down the street in front of the Property and made a U-turn. After the vehicle
18 completed the U-turn, two passengers, wearing all black clothing, exited the car and opened
19 fire. An unknown number of bullets were fired at the group standing in the yard of the
20 Property, hitting the female juvenile victim in the chest. From the scene of the shooting,
21 officers recovered a 9mm casing, eight .40 caliber casings, and three .223 caliber casings.

22 (x.) On **October 12, 2007**, LAPD Southeast Area patrol officers responded to a radio
23 call of an injury involving knives at the Property. Upon the officers' arrival at the Property, they
24 discovered that Spencer Williams, Jr. ("Williams") had gotten into a fight, involving knives, with
25 his brother (victim). Both Williams and his brother are residents of the Property. Williams was
26 located at the Property with a minor cut to his left arm and was not very cooperative with the
27 officers. Williams admitted being in a fight with his brother but denied that knives were
28 involving. After talking to Williams the officers heard a radio call involving a stabbing victim at

1 St. Francis Hospital. Officers conducted a follow-up to St. Francis Hospital and spoke with the
2 stabbing victim, who was the brother of Williams. The victim was very uncooperative and
3 denied being in a fight with his brother. The victim was treated for a deep three-inch laceration
4 to his right cheek, a laceration to his left forearm, and a laceration to his right palm. Williams
5 was arrested for a violation of Penal Code section 245 (a) (1) (Assault with a Deadly Weapon).

6 (y.) On **March 21, 2007**, Defendant Hawthorne contacted LAPD police officers
7 regarding a firearm that she found in the back house of the Property. Defendant Hawthorne
8 claimed that the firearm did not belong to anyone who lived at the Property. The firearm was a
9 semi-automatic pistol, loaded with 6 bullets.

10 (z.) On **March 14, 2007**, LAPD Southeast Area officers executed a search warrant at
11 the Property. As part of the search warrant the officers searched a vehicle in the driveway of
12 the Property. During the search of this vehicle, officers recovered 27 baggies of marijuana,
13 containing 46.48 gross grams, and 90 rounds of ammunition. Defendant Hawthorne told the
14 officers that the vehicle belonged to her nephew.

15 (aa.) On **February 23, 2007**, LAPD Southeast Area gang officers observed a vehicle
16 on the street in front of the Property, a place they knew to be a TLGC location. The vehicle
17 matched the description of a vehicle used in a shooting about a week earlier at 110th Street
18 and Lou Dillon Avenue, which is located very close to the Property. That prior shooting was
19 believed to be part of an ongoing gang war between TLGC and the Suicidals, resulting in six
20 shootings on 110th Street the previous week. As officers approached the vehicle, they could
21 smell marijuana and observed an individual later identified as Tranekia Richards ("Richards")
22 sitting in the front seat making furtive movements after she noticed the officers. Richards then
23 exited the car and locked it, leaving two male individuals inside, while she walked towards the
24 driveway. The officers approached her and asked her name. Richards falsely gave her name
25 as Taisha Boyd. Officers then talked to one of the male individuals in the car, a juvenile, who
26 admitted that he had weed and that they were in the car smoking weed. After searching the
27 vehicle, officers found Richards's California Identification card stating her real name, as well as
28 a loaded semi-automatic handgun hidden in a console above the gearshift. Officers arrested

1 Richards for Penal Code section 12031 (a) (1) (Possession of a Loaded Firearm in a Vehicle),
2 as she was in control of the car, had lied about her name, and had tried to distance herself
3 from the scene. The juvenile was arrested for Health and Safety Code section 11357 (b) –
4 Possession of Marijuana. Both Richards and the juvenile are documented TLGC gang
5 members, and both currently live or have lived at the Property.

6 (bb.) On **December 28, 2006**, LAPD Southeast Area officers were interviewing
7 individuals standing in the front yard of the Property about recent robberies that had occurred
8 in the area. While talking to these individuals, an officer noticed a firearm in the front yard
9 planter. The officers could not determine who owned the firearm, so they recovered the
10 firearm and booked it as evidence. The firearm was a .38 caliber Smith and Wesson revolver,
11 loaded with four live rounds.

12 (cc.) On **November 17, 2006**, LAPD Southeast Area gang officers went to the
13 Property to conduct a probation check on Alvin Boyd ("Boyd") pursuant to his probation
14 conditions. As they approached the Property they heard people yelling out "One Time" and
15 "Crash, Crash, Crash", which are common terms yelled out by gang members when they see
16 police approaching. The officers detained Boyd as he was walking away from a group of
17 people standing on the sidewalk, some of whom were drinking alcohol or smoking marijuana.
18 Three members of the group Boyd had been talking to were TLGC gang members. As part of
19 his probation Boyd was not permitted to associate with known gang members or even be near
20 the Property as it is a known gang location. Therefore, Boyd was arrested for Penal Code
21 section 1203.2 – Violation of Probation. An additional gang member of the Carver Park Crips,
22 Curtis Wynn ("Wynn"), was arrested for Penal Code section 3056 – Parole Violation. When
23 Wynn was searched at the station officers recovered 1.67 gross grams of marijuana from his
24 right front pocket.

25 (dd.) On **August 2, 2006**, LAPD Southeast Area officers were assigned to uniform
26 bicycle patrol when they received information on a wanted person. The wanted person bulletin
27 contained a photo of Alvin Boyd ("Boyd") and stated that he was wanted for questioning for
28 being a witness to a homicide. The bulletin stated that Boyd frequented the area of 110th

1 Street and Lou Dillon Avenue and that Boyd was wanted for an outstanding "no bail" probation
2 violation warrant. The officers rode to the area of 110th Street and Lou Dillon Avenue in an
3 attempt to locate Boyd. The officers observed Boyd standing in the front yard of the Property
4 and asked him to walk to the sidewalk. Boyd complied with the officers' request and was
5 arrested for an outstanding felony probation violation warrant and additional misdemeanor
6 warrants.

7 (ee.) On **June 25, 2006**, at approximately 3:00 p.m., William Bogan ("Bogan") and
8 Alvin Boyd ("Boyd") were shot while standing on the sidewalk in front of the Property. Bogan
9 was shot in the torso and killed. Bogan is a grandson of Defendant Hawthorne and a TLGC
10 gang member with the gang moniker of "E-Roc". Boyd is also a grandson of Defendant
11 Hawthorne and TLGC gang member with the gang moniker of "Baby Al". Boyd survived a
12 gunshot to his left ankle. Both Bogan and Boyd resided at the Property at the time of the
13 shooting. The murder and attempted murder were committed by two men who approached the
14 Property from the nearby alley and opened fire, shooting between four to five times, before
15 entering a white van parked in the alley and driving off.

16 (ff.) On **June 10, 2006**, at approximately 11:20 a.m., Defendant Hawthorne notified
17 the police that she had discovered two firearms under her house in a crawl space. Officers
18 responded and recovered an unloaded .22 caliber rifle and a loaded sawed-off shotgun. The
19 officers booked the firearms into evidence.

20 (gg.) On **June 10, 2006**, at approximately 7:00 a.m., LAPD Southeast Area officers
21 received numerous complaints from citizens about cars being burglarized in the neighborhood.
22 One witness told officers that four suspects had run to the Property after committing one of
23 these burglaries. Defendant Hawthorne consented to a search of her Property and during the
24 search of the garage the officers found two speakers and two amplifiers. The officers
25 discovered that these items had been placed there in the early hours of the morning.
26 Defendant Hawthorne said that she had seen four juveniles come through her house between
27 four and five in the morning but the juveniles told her that they had done nothing wrong.
28

1 (hh.) On **May 31, 2006**, LAPD Southeast Area officers arrested Tranekia Richards for
2 an outstanding warrant after they saw her standing in front of the Property. When Richards
3 observed the officers she attempted to walk away heading northbound on the driveway of the
4 Property but was apprehended by the officers. Richards is Defendant Hawthorne's
5 granddaughter and resides at the Property.

6 (ii.) On **May 27, 2006**, LAPD Southeast Area officers were patrolling in the area near
7 the Property due to an ongoing dispute between TLGC and the nearby P.J. Watts Crips gang.
8 Officers approached a large crowd standing on the street in front of the Property and observed
9 a juvenile whom they knew from previous contacts to be a TLGC gang member and on
10 probation for possession of a firearm. As the officer approached the group, the juvenile
11 appeared to be trying to conceal himself behind a larger unknown individual. The officers
12 began speaking with the juvenile and decided to conduct a pat down search for weapons due
13 to his current probation status. As one of the officers was about to search the juvenile, the
14 officer observed a bulge under the juvenile's T-shirt, on his right hip area. The officer reached
15 for the unknown concealed object and recognized it to be the handle of a firearm. The juvenile
16 stated, "Alright, you got me" and was taken into custody when the officers recovered the .380
17 caliber semi-automatic handgun. The juvenile stated that he was carrying the handgun
18 because he was afraid for his safety because of the ongoing feud with the P.J. Watts Crips
19 gang. The juvenile was arrested for Penal Code section 12101 (A) (1) / Welfare and
20 Institutions Code section 602 – Minor in Possession of a Concealed Firearm.

21 (jj.) On **December 6, 2001**, at approximately 3:30 p.m., a shooting occurred between
22 TLGC and the Suicidals gang at 110th and Hickory, just a block and a half away from the
23 Property. The victim of the shooting was a resident of the Property and TLGC gang member.
24 Additionally, two witnesses to the shooting were TLGC gang members and residents of the
25 Property. The witnesses, who are the brothers of the victim, were standing in front of the
26 Property when they witnessed the shooting. Later that evening, due to fears that retaliation
27 would occur and escalate the already bloody gang feud, LAPD Southeast Area officers were
28 conducting frequent uniformed patrols of the area. As the officers were walking southbound

1 through the alley toward 110th street, they observed William Bogan ("Bogan") suddenly appear
2 from the east at the mouth of the alley. The officers identified themselves so as not to be
3 mistaken for rival gang members. When Bogan saw the officers he stated, "Oh shit", and
4 started running away from the officers. As Bogan was running he put his hand in his right
5 jacket pocket as if he were trying to secure some unknown object. The officers began chasing
6 after Bogan who ran through the driveway of the Property to the back fence. Bogan then
7 jumped over the fence and threw the object in his pocket into the adjacent yard before he was
8 apprehended by police. Officers searched the area where Bogan had thrown the object, and
9 discovered a .380 caliber semi-automatic firearm, loaded with 5 rounds. Bogan is the
10 grandson of Defendant Hawthorne. Bogan was arrested for violating Penal Code 12021(a) -
11 Ex-Con in Possession of a Firearm. Bogan is a TLGC gang member with the gang moniker of
12 "E-Rock".

13 (kk.) On **August 25, 2001**, Rasheedah Jackson ("Jackson"), was arrested at the
14 Property for Penal Code section 245 (A) (1) - Assault with a Deadly Weapon. Jackson was
15 accused, by one of her neighbors ("victim"), of smashing out the front window of the victim's
16 home by throwing rocks at the house. Also, Jackson approached the victim and swung a pipe
17 at her. Jackson is a resident of the Property.

18 (ll.) On **January 22, 2001**, two male Hispanics ("victims 1 and 2") who were looking
19 for a home to purchase, drove their GMC van east on 110th Street from Lou Dillon Avenue,
20 passing a group of approximately 15 male individuals loitering near the corner. The driver of
21 the vehicle ("victim 1"), after realizing that he had entered a dead-end street, negotiated a U-
22 turn and returned westbound toward Lou Dillon Avenue. Victim 1 observed an individual, later
23 identified as Melvin Lemon ("Lemon"), walking across 110th Street to the north side of the
24 street. Victim 1 observed Lemon throw a large glass bottle at the victim's vehicle, striking and
25 shattering the side window. The glass from the window struck both victim 1 and victim 2 on
26 the right side of their faces, leaving multiple small cuts. Victim 1 then turned the vehicle
27 northbound on Lou Dillon Avenue and observed a suspect on the south side of 110th Street
28 with a blue steel revolver in his right hand. Victim 1 continued driving northbound on Lou

1 Dillon Avenue and heard approximately five shots fired, striking his vehicle three times. The
2 victims flagged down a LAPD patrol vehicle at Manchester Boulevard and Central Avenue and
3 reported what had occurred, together with a description of both suspects. The officers
4 responded to the crime scene and observed several male individuals standing in front of the
5 Property, with one of them identified as Lemon. The group ran north up the driveway toward
6 the end of the residence on the Property where the officers detained three individuals. While
7 those individuals were being detained, Tony Hawthorne ("Hawthorne"), a TLGC gang member,
8 approached the officers stating, "What the fuck is going on here?" The officers asked
9 Hawthorne to return to the street but he refused stating, "Fuck you! I ain't got to do anything.
10 This is my grandmother's house." Despite warnings from the officers, Hawthorne refused to
11 comply with the officer's directions and was arrested for interfering with the investigation. The
12 Assault with a Deadly Weapon victims were transported back to the scene and identified
13 Lemon as the suspect who had thrown the bottle at the van. Lemon was arrested for Penal
14 Code section 245 (A) (1) – Assault with a Deadly Weapon.

15 (mm.) On **January 19, 2001**, at approximately 11:30 pm, a 53-year-old man ("victim")
16 was shot and killed while driving down 110th street in front of the Property. The victim was
17 driving eastbound on 110th Street when he was forced to make a U-turn in front of the
18 Property, as the street ends in a dead end. As the victim passed by the Property after making
19 the U-turn, unknown individuals gathering outside in front of the Property fired several rounds
20 at the victim. The victim's vehicle was hit three to four times, with one of the bullets going
21 through the victim's neck, killing him. After the shooting, when LAPD officers arrived at the
22 scene, approximately 15-20 people ran into the Property.

23 20. Defendants, and DOES 1 through 50, in owning, conducting, maintaining,
24 occupying and/or permitting the use of, the Property, directly or indirectly, as a public nuisance,
25 have engaged in wrongful conduct and caused a serious threat to the general health, safety
26 and welfare of the persons in the area surrounding the Property.

27 21. Unless Defendants, and DOES 1 through 50, are restrained and enjoined by
28 order of this Court, they will continue to use, occupy and maintain, and to aid, abet or permit,

1 directly or indirectly, the use, occupation, and maintenance of the Property, together with the
2 fixtures and appurtenances located therein, for the purpose complained of herein, to the great
3 and irreparable damage of Plaintiff and in violation of California law.

4 **PRAYER**

5 **WHEREFORE, PLAINTIFF PRAYS THAT THIS COURT ORDER, ADJUDGE AND**
6 **DECREE AS FOLLOWS:**

7 1. That the Property, together with the fixtures and moveable property therein and
8 thereon, be declared a public nuisance and be permanently abated as such in accordance with
9 Civil Code section 3491.

10 2. That each Defendant and their agents, officers, employees and anyone acting on
11 their behalf, and their heirs, successors and assignees, be preliminarily and perpetually
12 enjoined from operating, conducting, using, occupying, or in any way permitting the use of the
13 Property as a public nuisance. Such orders should include, but not be limited to: a) an order
14 that the Defendants implement physical and managerial improvements to the Property
15 designed to prevent the presence of gang members on the Property, including without
16 limitation, perimeter security, lighting, a video monitoring system, tenant screening, use of
17 written leases and house rules, and prohibitions on permitting known gang members to enter
18 the Property; and b) such other orders as are appropriate to remedy the nuisance on the
19 Property and enhance the abatement process.

20 3. Such costs as may occur in abating said nuisance at the Property and such other
21 costs as the Court shall deem just and proper.

22 4. That Plaintiff be granted such other and further relief as the Court deems just and
23 proper, including closure and/or demolition of the Property.

24 5. That Plaintiff recover the amount of the filing fees and the amount of the fee for
25 the service of process or notices which would have been paid but for Government Code
26 section 6103.5, designating it as such. The fees may, at the Court's discretion, include the
27 amount of the fees for certifying and preparing transcripts.

28 ///

1 6. That Plaintiff be granted such other and further relief as the Court deems just and
2 proper.

3 DATED: June 10, 2015

Respectfully submitted,

4 MICHAEL N. FEUER, City Attorney

5 JONATHAN CRISTALL, Supervising Assistant City Attorney

6
7 By: 

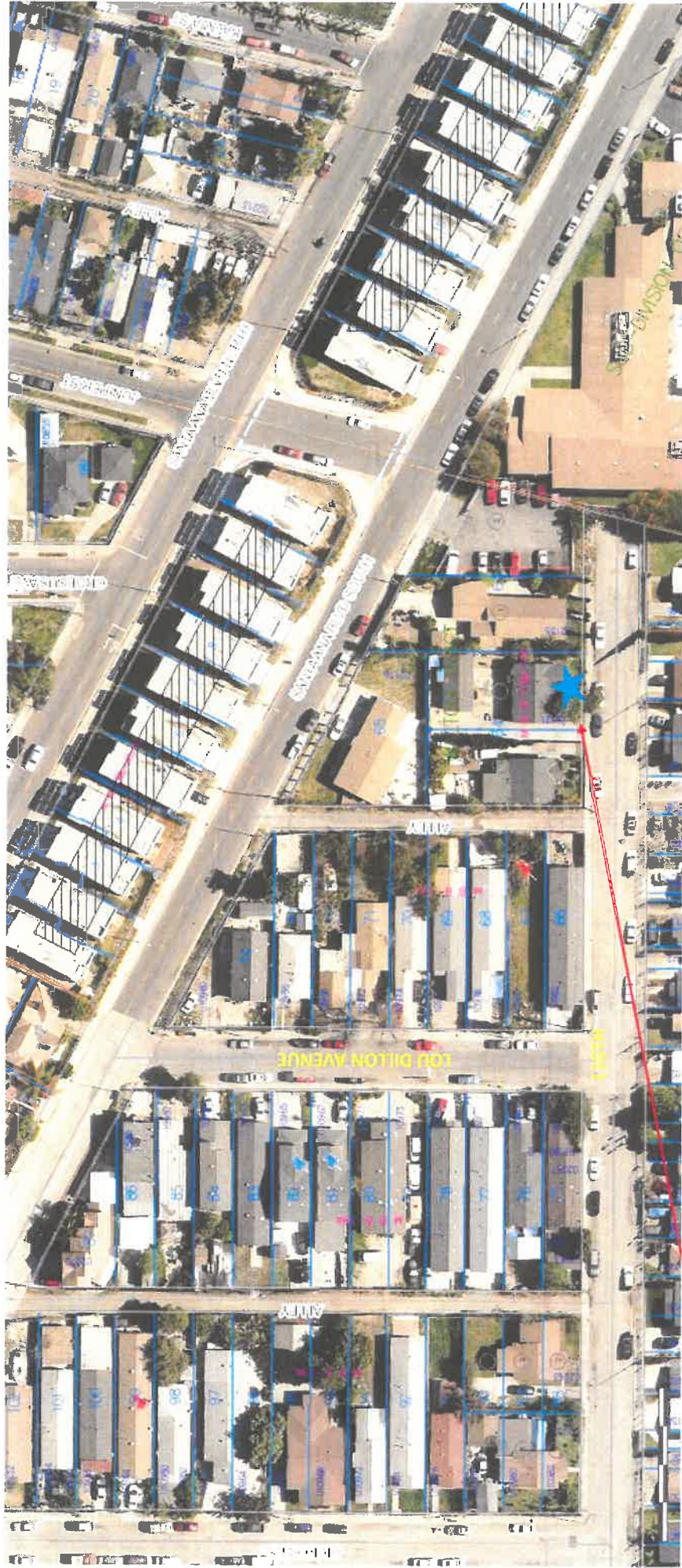
JENNIFER VARELA, Deputy City Attorney

8 Attorneys for Plaintiff, THE PEOPLE OF THE STATE
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EXHIBIT A



EXHIBIT B



★ = 2127 E 110th Street

EXHIBIT C



EXHIBIT D



EXHIBIT E



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